UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA (Alexandria Division)

CITIGROUP INC.,)
Plaintiff,)
V.) Civil Action No. 1:11-cv-1361 (LMB/TRJ)
<cicicards.com> et al.,</cicicards.com>)
Defendants.)

MOTION TO WITHDRAW

Kevin B. Bedell and Amanda J. Katzenstein, two of the counsel of record for Plaintiff Citigroup Inc. ("Citigroup"), respectfully move this Court pursuant to Local Civil Rule 83.1(G) for entry of an order allowing them to withdraw as counsel of record for Citigroup in the above-captioned matter.

Following the recent transition of an attorney from Greenberg Traurig, LLP to Winston & Strawn LLP, this matter was transferred to Winston & Strawn LLP. Greenberg Traurig no longer represents Citigroup Inc. in this case. Charles B. Molster, III, of Winston & Strawn LLP, entered his appearance in this matter as local counsel on March 3, 2012, and Marc Trachtenberg, also of Winston & Strawn LLP, filed a motion to appear pro hac vice on March 6, 2012, which was granted on March 13, 2012. Mr. Molster and Mr. Trachtenberg, new counsel for Citigroup, consent to this motion.

Mr. Bedell and Ms. Katzenstein therefore seek to withdraw as counsel of record for Citigroup in this matter. No other party has made an appearance in this case. The withdrawal will therefore cause no delay of this matter, nor will it prejudice any party.

WHEREFORE, for the reasons stated above, Kevin B. Bedell and Amanda J. Katzenstein respectfully request that they be granted leave to withdraw as counsel of record for Plaintiff Citigroup Inc.

Date: March 15, 2012 Respectfully submitted,

/s/ Amanda J. Katzenstein

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CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2012, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, and that service will thereby be accomplished on:

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